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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

TYRONE NARVAEZ,

Debtor.

Chapter 13

Case No. 24-11360 (VFP)

Honorable Vincent F. Papalia, U.S.B.J.

I, IRVING J. ANGELL, III, of full age, being duly sworn according to law, upon my oath,
deposes and says:

1. I am the Owner and President of C.S. Osborne (“C.S. Osborne”), the secured judgment creditor of Debtor Tyrone Narvaez (“Debtor”). I make this Certification in support of C.S. Osborne’s motion (the “Motion”) for the Court to dismiss Debtor’s bankruptcy case as a bad faith filing or, in the alternative, for relief from the stay to allow for the sale of Debtor’s real property located at 638-640 Jefferson Avenue, Elizabeth, New Jersey (the “Property”).

2. I am personally familiar with all of the facts and all of the proceedings in the above matter.

3. The details concerning Debtor’s history with C.S. Osborne, theft of C.S. Osborne’s inventory, resale of the stolen inventory through fictitious entities to line his own pockets, and his ensuing arrest and prosecution for theft are set forth in great detail in C.S. Osborne’s Verified Complaint dated March 30, 2022 (annexed hereto as **Exhibit 1**) and filed with the Superior Court

of New Jersey, Chancery Division, Union County (the “State Court”), my certification dated November 4, 2022 (annexed to the Angell Cert. as **Exhibit 2**),¹ and the State Court’s Order and Opinion dated December 23, 2022, entering judgment in favor of C.S. Osborne as against Debtor (annexed to the Angell Cert. as **Exhibit 3**).

4. The Property is Debtor’s principal residence.

5. Although Debtor promised, on multiple occasions, that he would remit to C.S. Osborne the funds in his C.S. Osborne profit-sharing account and refinance the Property in order to repay C.S. Osborne for his theft of C.S. Osborne’s inventory, Debtor has not fulfilled either of those promises.

6. C.S. Osborne’s December 23, 2022 judgment against Debtor (the “Judgment”) was docketed as a statewide lien on January 5, 2023 bearing Judgment Number J-002646-23.

7. Annexed hereto as **Exhibit 4** is a true and accurate copy of an excerpt of the file received from the Hudson County Prosecutor’s Office in connection with the State Court litigation.

8. Annexed hereto as **Exhibit 5** is a true and accurate copy of Debtor’s Judgment of Conviction and Order of Commitment obtained in connection with the State Court litigation.

9. Annexed hereto as **Exhibit 6** is a true and accurate copy of Debtor’s Guilty Plea Form obtained in connection with the State Court litigation.

10. Annexed hereto as **Exhibit 7** is a true and accurate copy of September 14, 2022 Letter from the Office of the Hudson County Prosecutor obtained in connection with the State Court litigation.

¹ In the interests of brevity and avoiding redundancy, C.S. Osborne omits the nearly 553 pages of exhibits to this certification as several of the exhibits are already included with the Motion papers. C.S. Osborne will produce any exhibits not produced herewith upon request.

11. Annexed hereto as **Exhibit 8** is a true and accurate copy of the State Court's April 5, 2022 Order to Show Cause.

12. Annexed hereto as **Exhibit 9** is a true and accurate copy of the State Court's May 16, 2022 Order.

13. Annexed hereto as **Exhibit 10** are true and accurate copies of C.S. Osborne's August 16, 2022, August 25, 2022 and August 31, 2022 letters to Debtor.

14. Annexed hereto as **Exhibit 11** are true and accurate copies of March 13, 2023 and March 16, 2023 Affidavits of Service from the Union County Sheriff's Office.

15. Annexed hereto as **Exhibit 12** are true and accurate copies of the State Court's January 31, 2024 Orders.

16. Annexed hereto as **Exhibit 13** is a true and accurate excerpt of a January 5, 2024 title report relating to the Property.

17. Annexed hereto as **Exhibit 14** is a true and accurate copy of a March 19, 2024 appraisal report performed by Louis Sorce of The Appraisal Source.

18. Annexed hereto as **Exhibit 15** is a true and accurate copy of a February 17, 2024 appraisal report performed by Joseph Fisher IFA, which appraisal was obtained by Debtor.

19. Annexed hereto as **Exhibit 16** is a true and accurate copy of the Transcript for the March 28, 2023 Deposition of Tyrone Narvaez.

20. Annexed hereto as **Exhibit 17** are pension documents produced by the United Parcel Service ("UPS") in connection with a subpoena served upon UPS in the State Court litigation.

I certify that the foregoing statements made by me are true. I am aware that if any of the
foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 11, 2024



IRVING J. ANGELL, III